

**IN THE DRAWINGS**

The attached sheet of drawings includes changes to Fig. 1. This sheet replaces the original sheet including Fig. 1. In Figure 1, the label “Prior Art” has been added to the top of the sheet.

Attachment: Replacement Sheet  
Annotated Sheet Showing Changes

## **REMARKS**

Claims 1-7 are pending in this application. In this Response, Applicants have provided remarks that explain some of the differences between the reference cited by the Examiner and the present invention. Applicants have also amended the written description to limit the abstract to one paragraph. Moreover, the drawings have been amended to overcome the Examiner's objections. As no new matter has been added, Applicants respectfully request entry of the amendments at this time.

## **OBJECTIONS TO THE SPECIFICATION**

At pages 2-4 of the Office Action, the Examiner objected to the disclosure of the specification because: (i) there is no background of the invention; (ii) there is no brief summary of the invention; (iii) there is no brief description of the drawings; and (iv) there is no detailed description of the invention. The Examiner also objected to the arrangement of the specification, stating that it should include the sections set forth in 37 CFR 1.77(b). Furthermore, at pages 4-5 of the Office Action, the Examiner objected to the abstract of the invention because it was more than one paragraph.

Applicants have amended the written description to limit the abstract to one paragraph, as shown above. However, Applicants submit that the remaining portions of the written description are in compliance with 35 U.S.C. §112. Further, Applicants submit that the provisions of 37 CFR 1.77(b) are merely suggested, and are not required. As such, Applicants submit that the Examiner's objections to the specification have been overcome.

## **OBJECTIONS TO THE DRAWINGS**

At page 5 of the Office Action, the Examiner stated that Applicants are required to furnish formal drawings. Accordingly, Applicants have submitted a formal drawing for Figure 1. The Examiner also stated that Figure 1 should be designated by a legend, such as "Prior Art," because only that which is old is illustrated. In order to expedite prosecution of the application, the Examiner's suggestion has been followed. As such, Applicants have labeled Figure 1 with the heading "Prior Art."

## **THE REJECTION UNDER 35 U.S.C. §102(b)**

At pages 5-7 of the Office Action, the Examiner rejected claims 1-7 under 35 U.S.C. §102(b) based on U.S. Patent No. 5,963,933 to Cheng *et al.* (“Cheng”). Applicants submit that Cheng does not teach the present invention for the reasons that follow.

Cheng discloses a method for specifying SQL “full outer joins” which enable the use of arbitrary join conditions in specifying a particular query. *See Abstract.* Cheng also discloses embodiments that improve execution speed. *Id.* For instance, Cheng teaches using the “ANTI-JOIN” as second operand of a union query. *Id.* The anti-join is implemented as a right outer join coupled with an ISNULL predicate. *Id.*

In contrast, the present invention provides a method of preventing unnecessary joins between tables in a database. *See Page 1, line 3-6.* In particular, the method includes rewriting SQL statements to prevent the execution of unnecessary joins. *Id.* The method also includes using a SQL statement to determine a unique identifier to a row of a master table. *See Page 4, lines 1-3.* Then, the unique identifier to the row of the master table is equated to an identifier to related rows of the detail table using the join condition. *See Page 4, lines 25-28.* In this manner, the new SQL statement that is generated only refers to the detailed table, thereby eliminating the join.

In light of these differences, Applicants submit that the Examiner has failed to make a *prima facie* case of anticipation, *i.e.*, Cheng does not teach each and every element of the present invention. For example, Cheng does not disclose a method for preventing processing of a join between two tables, as asserted by the Examiner. *See Office Action at Page 6.* Rather, Cheng discloses a novel operator called an “ANTI-JOIN.” *See Col. 5, lines 47-56.* However, despite its connotation, the anti-join is implemented as a right outer *join* coupled with an ISNULL predicate. *Id.* Additionally, Cheng discloses using a union of the right outer join with a left outer join to implement a full outer join. Thus, despite the use of the term “anti-join,” Cheng still processes joins between two tables. As such, Applicants submit that the Examiner lacks a basis for the anticipation rejection under 35 U.S.C. §102(b).

In addition, the Examiner states that Cheng equates a unique identifier with an identifier to related rows of a detail table using a join condition. *See Office Action at Page 6.* In contrast to the Examiner’s assertion, however, Cheng does not mention or suggest equating a unique identifier to related rows of a detail table. Rather, Cheng uses a method of adding a constant to selected columns in order to select rows of a first table (DT2) that do not have any matching rows in a

second table (DT1). *See* Col. 5, lines 35-42. Moreover, Cheng specifically states that this method is used when a given table's *row identifiers are not readily available*. *See* Col. 5, lines 35-37. Thus, the disclosure of Cheng cannot teach the present invention.

Moreover, the Examiner states that Cheng produces a revised SQL statement that only refers to the detail table using the identifier to the at least one row of the detail table. *See* Office Action at Page 6. However, the Examiner's assertion is factually incorrect. In fact, Cheng does not teach or suggest using an identifier that refers to a detail table. Further, there is no mention of producing a revised SQL statement that only refers to a detail table using the identifier.

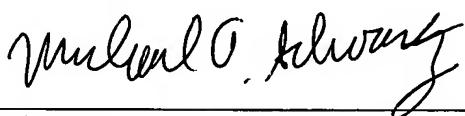
In sum, the Examiner has failed to establish a *prima facie* case of anticipation because Cheng does not disclose each and every element of the present invention. For at least the reasons set forth above, Applicants respectfully submit that the Examiner's rejection of independent claim 1 under 35 U.S.C. §102(b) has been traversed. Moreover, Applicants submit that claims 2-7 are allowable, at least by virtue of their dependency from independent claim 1, but also for additional novel features described therein. Reconsideration and allowance of the pending claims is respectfully requested.

### CONCLUSION

All claims are believed to be in condition for allowance. If the Examiner believes that the present amendments and remarks still do not resolve all of the issues regarding patentability of the pending claims, Applicants invite the Examiner to contact the undersigned attorney to discuss any remaining issues. No fees are believed to be due at this time. Should any fee be required, however, please charge such fee to Swidler Berlin LLP Deposit Account No. 195127, Order No. 19111.0127.

Respectfully submitted,  
SWIDLER BERLIN LLP

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**PRIOR ART** — "PRIOR ART" has been added

Application No. 10/673,394  
Group Art Unit: 2162  
Sheet 1 of 1

## ANNOTATED SHEET

EMP	ENAME	DEPTNO
	CHRIS	10
	STEVE	10
	PAUL	20
	JOHN	30

DEPT	DEPTNO	DNAME
	10	R & D
	20	SALES
	30	ACCOUNTS

Figure 1